

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN THE MATTER OF: ) IN BANKRUPTCY  
 )  
**JOHN ROBERT ROEHLK,** ) Case No. 17-32596  
 )  
Debtor(s). )

**NOTICE**

TO: - Joseph S. Davidson, Attorney for Debtor – Service through CM/ECF  
- Office of the United States Trustee - Service through CM/ECF  
- John Robert Roehlke, 620 S. Hough Street, Unit G, Barrington, IL 60010 -  
Service by First Class U. S. Mail

PLEASE TAKE NOTICE that on the 31st day of January, 2020 at the hour of 11:45 a.m. or as soon thereafter as counsel may be heard, I shall appear before the Honorable **A. BENJAMIN GOLDFAR**, Bankruptcy Judge, Park City Branch Court, 301 S. Greenleaf Ave., Park City, IL 60089, Courtroom B, and then and there present the attached Trustee's Motion for Turnover of Life Insurance Cash Surrender Value, at which time and place you may appear if you so see fit.

/s/ Joseph E. Cohen  
JOSEPH E. COHEN  
105 W. Madison Street, Suite 1100  
Chicago, Illinois 60602  
312/368-0300

STATE OF ILLINOIS )  
 ) SS  
COUNTY OF C O O K )

JOSEPH E. COHEN, being first duly sworn on oath, deposes and states that he served a copy of the foregoing Notice together with a copy of the Motion attached hereto on the parties shown above, by electronic service or by First Class U. S. Mail Delivery this 7th day of January, 2020.

/s/ Joseph E. Cohen

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IN THE MATTER OF: ) IN BANKRUPTCY  
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JOHN ROBERT ROEHLK, ) Case No. 17-32596  
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**MOTION FOR TURNOVER OF LIFE INSURANCE CASH SURRENDER VALUE  
PURSUANT TO SECTION 521(a)(4)**

TO THE HONORABLE A. BENJAMIN GOLDGAR,  
BANKRUPTCY JUDGE

Now comes, JOSEPH E. COHEN, Trustee herein, and respectfully represents unto this Honorable Court as follows:

1. That Joseph E. Cohen is the duly appointed Trustee in Bankruptcy herein.
2. That Section 521(a)(4) of the Bankruptcy Code states that the Debtor shall surrender to the Trustee all property of the estate and any recorded information, including books, documents, records and papers relating to property of the estate.
3. That the Debtor's Schedule B states that on the date of filing of the Chapter 7 the Debtor maintained a life insurance policy with Country Life Insurance Company ending in Account No. 7162.
4. The information provided to the Trustee by the Debtor indicated that the policy cash value was \$37,488.79. The information provided by the Debtor also indicated that there is a loan balance against the life insurance policy in the amount of \$8,595.60.
5. That the Debtor has not claimed any portion of the life insurance cash value exempt.

6. The Trustee believes that the remaining equity in the cash value as stated above is property of the Bankruptcy Estate and should be turned over to the Trustee for administration.

WHEREFORE, JOSEPH E. COHEN, Trustee herein, prays for the entry of an order directing the Debtor to immediately turnover to the Trustee the sum of \$37,488.79 less any loan balance owing as of the date of filing representing the net cash surrender value of the Debtor's life insurance policy ending in Account No. 7162 issued by Country Life Insurance Company; that the Debtor turnover any and documents relating to the current net value of said life insurance policy and for such other relief as the Court shall deem proper.

JOSEPH E. COHEN  
GINA B. KROL  
COHEN & KROL  
105 W. Madison St., Ste 1100  
Chicago, IL 60602  
(312) 368-0300

/s/ Joseph E. Cohen  
JOSEPH E. COHEN, Trustee